



U.S. Department of Justice
United States Attorney
District of New Jersey

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Newark, New Jersey 07102

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February 13, 2024

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Federal Courthouse
Newark, New Jersey 07102

Re: United States v. Gordon Coburn and Steven Schwartz
Crim. No. 19-120 (MEF)

Dear Judge Farbiarz:

The parties jointly submit this letter to update the Court on the status of potential stipulations relating to the Government's Motions *in Limine* No. 1 and 3, and supplemental motion *in limine*, see ECF No. 501 at 5-9, 12-14; ECF No. 580, relating to documents the Government seeks to admit pursuant to Federal Rules of Evidence 803(6) and 902(11) (collectively, the "Government's Business Records Motions"). The parties have made substantial progress in reaching stipulations that would narrow the issues that are the subject of these motions but require additional time to negotiate a final agreement. We respectfully request two additional weeks from today to provide the Court with a further update on the status of the parties' discussions concerning the Government's Business Records Motions.

Respectfully submitted,

GLENN S. LEON
Chief

PHILIP R. SELLINGER
United States Attorney

/s/ Sonali D. Patel

/s/ Jonathan Fayer

SONALI D. PATEL
Fraud Section, Criminal Division
U.S. Department of Justice

JONATHAN FAYER
Assistant U.S. Attorney
District of New Jersey

SO ORDERED.

A handwritten signature of Michael E. Farbiarz in black ink, written over a horizontal line.

Michael E. Farbiarz, U.S.D.J.
Date: 2/15/2024